

Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the
Commonwealth.

ORDER GRANTING FIVE HUNDRED FORTY-NINTH
OMNIBUS OBJECTION (SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO
RICO TO CLAIMS FOR WHICH THE DEBTOR IS NOT LIABLE

Upon the *Five Hundred Forty-Ninth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Claims for which the Debtor Is Not Liable* (the “Five Hundred Forty-Ninth Omnibus Objection”)² of the Commonwealth of Puerto Rico (the “Commonwealth” or “Objecting Debtor”), dated October 28, 2022, for entry of an order disallowing in their entirety

¹ The Debtors in the Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations)

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Five Hundred Forty-Ninth Omnibus Objection.

certain claims filed against the Objecting Debtor, as more fully set forth in the Five Hundred Forty-Ninth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Five Hundred Forty-Ninth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA Section 306(a); and venue being proper pursuant to PROMESA Section 307(a); and due and proper notice of the Five Hundred Forty-Ninth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the claims identified in the column titled “Claims to be Disallowed” in Exhibit A to the Five Hundred Forty-Ninth Omnibus Objection (collectively, the “Claims to Be Disallowed”) having been found to be claims for which neither the Commonwealth nor any of the other Title III Debtors are liable; and the Court having determined that the relief sought in the Five Hundred Forty-Ninth Omnibus Objection is in the best interest of the Commonwealth, its creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Five Hundred Forty-Ninth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Five Hundred Forty-Ninth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that Kroll is authorized and directed to designate the Claims to Be Disallowed as expunged on the official claims register in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 22753 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Five Hundred Forty-Ninth Omnibus Objection

Five Hundred Forty-Ninth Omnibus Objection
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	PRADO RODRIGUEZ, BIENVENIDA HC-01 BOX 4156 NAGUABO, PR 00718	02/03/2020	17 BK 03283-LTS	Commonwealth of Puerto Rico	173104-1	Undetermined*
<p>Reason: Claim purports to assert liabilities associated with the litigation captioned Nilda Agosto Maldonado et al. v. Commonwealth of Puerto Rico Family Department et al., Civil No. KPE-2005-0608 (the "Litigation"). However, based on documentation submitted by the attorney representing all claimants in the Litigation, Claimant is not a named plaintiff in that Litigation, and there is therefore no basis for claimant to assert liabilities associated with that Litigation against the Commonwealth, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim no. 115276, the master proof of claim filed on behalf of all plaintiffs associated with the litigation captioned Agosto Maldonado. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.</p> <p>Claim #173104-1 also contained on Exhibit A to the 548th Omnibus Claims Objection for Claims to Be Disallowed.</p>						
2	RODRIGUEZ FARIA, MARILYN URB PASEO SOL Y MAR CALLE CORAL 640 JUANA DIAZ, PR 00795	05/18/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	14149	Undetermined*
<p>Reason: Claim purports to assert liabilities associated with the litigation captioned Nilda Agosto Maldonado et al. v. Commonwealth of Puerto Rico Family Department et al., Civil No. KPE-2005-0608 (the "Litigation"). However, based on documentation submitted by the attorney representing all claimants in the Litigation, Claimant is not a named plaintiff in that Litigation, and there is therefore no basis for claimant to assert liabilities associated with that Litigation against the Commonwealth, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim no. 115276, the master proof of claim filed on behalf of all plaintiffs associated with the litigation captioned Agosto Maldonado.</p> <p>Claim #14149 also contained on Exhibit A to the 548th Omnibus Claims Objection for Claims to Be Disallowed.</p>						
TOTAL						Undetermined*

*Indicates claim contains unliquidated and/or undetermined amounts